

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) John A Hopkins, III; Case No. 16-39701 Chapter 13

All Cases: Moving Creditor Wilmington Savings Fund Society, FSB d/b/a christiana Trust, Not in it's individual capacity but solely as the trustee for the brougham fund I trust Date Case Filed 12/19/2016

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 5/22/2017

Chapter 7: ☐ No-Asset Report Filed on \_\_\_\_\_

☐ No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

a. ☒ Home

b. ☐ Car Year, Make, and Model \_\_\_\_\_

c. ☐ Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$247,250.37

Total of all other Liens against Collateral \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$175,000.00 (per Amended Schedule A/B)

5. Default

a. ☐ Pre-Petition Default

Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of Months 3 Amount \$5,477.12

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

a. ☐ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_

iii. ☐ Rapidly depreciating asset

iv. ☐ Other (describe) \_\_\_\_\_

b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☐ Other "cause" § 362(d)(1)

i. ☐ Bad Faith (describe) \_\_\_\_\_

ii. ☐ Multiple Filings

iii. ☐ Other (describe) \_\_\_\_\_

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm

☐ Redeem

☐ Surrender

☒ No Statement of Intention Filed

Date: 10/15/18

/s/ Nisha B. Parikh

Counsel for Movant

[illegible]

Loan#	
Borrower:	Hopkins
Date Filed:	12/19/2016
First Post Petition Due Date:	1/1/2017
POC covers:	4/1/16 - 12/1/16

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